



MEMO ENDORSED

STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

October 25, 2019

Hon. Kenneth M. Karas
United States District Judge
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: John Doe #1, et al. v. Putnam County, 16-CV-8191

Dear Judge Karas:

I represent the Intervenor, New York State Attorney General, in this matter. I write to request a brief extension to the deadline for the Movant's Pre-Motion Letter. The current deadline is October 29, 2019. By this letter, I request to adjourn this date one-week until November 5, 2019. This extension would apply to all parties intending to submit pre-motion letters.

Both Plaintiff's and Defendant's counsel has graciously consented to this request. The currently scheduled Court Conference on November 14, 2019 would not be disturbed by this request. As I assume both Intervenor and Plaintiff intend to move in this matter, the Non-Movant letters (currently due on November 5, 2019) could be only slightly adjusted until November 8, 2019. No other deadline in this matter would be disturbed as a result of these changes.

I request this relief due the fact that I was just today assigned a complex Medicaid matter in my office with an order to show cause/preliminary injunction return date that coincides with my pre-motion letter in this matter. The additional time will allow me to meaningfully comply with all deadlines.

Thank you for consideration of this request.

Respectfully submitted,
S/ C. Harris Dague
C. Harris Dague
Assistant Attorney General

cc: Davis Cooper, Esq. (via CM/ECF)
Michael Randazzo, Esq. (via CM/ECF)

C. Harris Dague
So ordered
MM